REMARKS

With this Amendment, claims 1, 2, 3, 12, 13, 17, 18, 21 and 23 are amended. Claims 1-5 and 12-23 remain pending. Reconsideration and review of the pending claims are respectfully requested.

Claim Rejections

The Examiner states that claims 1-3, 5, 12-14, and 16 are rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 4,518,249 to Murata. However, the subsequent comments refer to Seymour, and therefore, Applicant assumes that this set of claims actually stands rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,724,259 to Seymour et al. (Seymour). The Examiner also rejects claims 4, 15 and 17-23 under 35 U.S.C. 103(a) as being unpatentable over Seymour in view of Murata. Applicant disagrees.

Although the Examiner did not combine the Seymour and Murata references in the rejection of independent claims 1, 12 and 13, in light of the rejection of independent claim 17, Applicant will address both references with respect to these claims.

In particular, with respect to amended independent claim 1, neither Seymour nor Murata describes or suggests a camera assembly including two mirrors positioned within a housing and positioned symmetrically with respect to a plane that is perpendicular to the paper substrate of the printing press to direct light in two distinct paths from the same light source to the paper substrate, as required by claim 1.

Seymour describes a camera assembly including two light sources, each light source having an associated reflector for directing light to the web, as illustrated in Fig. 3(a) and described at Col. 6, lines 3-7. The light sources in the camera assembly of Seymour are point sources of light, such as bulbs. The reflectors in the camera assembly of Seymour are circular Vromanoid reflectors, each surrounding a bulb and having a characteristic such that equal angles of light emitted from the strobe translates into equal distances on the web (see Col. 6, lines 3-34 and Figs. 3(a)-(c)). In the camera assembly of Seymour, the two light sources and associated reflectors are positioned symmetrically with respect to a plane that is perpendicular to the paper substrate in order to provide uniform illumination to the web. Seymour at Col. 7, line 1 suggests

that illumination could be provided by a single strobe light or a plurality of strobe lights. Presumably, since no alternatives are suggested, this means a single light source with a single associated reflector for reflecting light to the paper substrate.

Murata describes a copying machine having a single light source and two reflectors including an elliptical reflector 5 and a plane mirror 4. The light source is a linear light source for illuminating a linear area on the original to be copied. The reflectors illustrated therein are not positioned symmetrically with respect to a plane that is perpendicular to the paper substrate to direct light in two distinct paths from the same light source to the paper substrate.

However, without the benefit of hindsight, there is simply no suggestion or motivation to select the light source and two associated reflectors of the copying machine of Murata and combine them with the arrangement of the two reflectors of the camera assembly of Seymour to obtain the invention as defined by Applicant's claim 1. The arrangement of the two reflectors in Seymour only makes sense when each reflector has its own associated light source. A circular Vromanoid reflector as described in Seymour can only operate with a single point source of light. In other words, no motivation exists to combine these two references, and certainly no motivation exists to combine them in the manner required to obtain the invention defined by Applicant's claim 1.

Therefore, claim 1 defines over the references cited by the Examiner, and is allowable. Claims 2-5 depend from claim 1, and are allowable for at least the reasons discussed above with respect to claim 1. Further, Applicants assert claims 2-5 specify additional limitations that, in combination with claim 1, are believed to be patentable.

In particular, with respect to dependent claim 2, neither Seymour nor Murata describe or suggest a camera assembly wherein two mirrors are positioned symmetrically with respect to a plane that is perpendicular to the paper substrate and wherein that plane passes through the lens and the light source, as defined by claim 2.

Further, with respect to dependent claim 3, neither Seymour nor Murata describe or suggest a camera assembly wherein an axis of the light source is parallel to an axis of a camera lens.

With respect to amended independent claim 12, neither Seymour nor Murata describes or suggests a lighting assembly including two mirrors positioned adjacent the same single strobe light source to direct light in two distinct paths of equal length of uniform illumination from the

same said light source to the paper substrate, as defined by claim 12. As stated above, Seymour discloses a camera assembly including two light sources, each with an associated single reflector for directing light in two distinct paths to the paper substrate. Murata discloses a copying machine having a linear light source, an elliptical reflector, and a flat mirror for illuminating an original. The light paths from the light source in the coping machine of Murata are not of equal length or uniform illumination.

Without the benefit of hindsight, it is simply no suggestion or motivation for how or why one would select the linear light source and two associated reflectors of Murata and combine it with the arrangement of the two reflectors in the camera assembly of Seymour to obtain the invention as defined by Applicant's claim 12. The arrangement of the two reflectors for directing light in two distinct paths to the substrate as shown in the camera assembly of Seymour only makes sense when each reflector has its own associated light source. In other words, no motivation exists to combine these two references, and certainly no motivation exists to combine them in this manner required to obtain the invention defined by Applicant's claim 12.

With respect to amended independent claim 13, neither Seymour nor Murata describes or suggests a method for creating dual light paths directed toward a paper substrate including the steps of positioning two mirrors adjacent the same light source and at symmetrical distances from the paper substrate such that light from the light source strikes the mirrors and is redirected in two distinct light paths toward the paper substrate, as defined by claim 13. In particular, claim 13 is similar in relevant respects to the claim 1 as discussed above.

Therefore, claims 12 and 13 define over the references cited by the Examiner, and are allowable. Claims 21-23 depend from claim 12, and are allowable for at least the reasons discussed above with respect to claim 12. Claims 14-16 depend from claim 13, and are allowable for at least the reasons discussed above with respect to claim 13.

With respect to amended independent claim 17, neither Seymour nor Murata suggest a method for positioning at least two mirrors adjacent a single light source and symmetrically with respect to a plane that is perpendicular to the paper substrate of the printing press and passes through the light source, such that light from said light source is split into dual light paths of equal length of uniform, non-collimated illumination and directed toward the substrate by said mirrors.

The Examiner states that "it would have been obvious... to combine Seymour's apparatus with that of Murata to enhance the invention." It is unclear how the two references are to be combined, and what motivation exists to combine them. It is Applicant's position that enhancing the invention is not sufficient motivation to make a prima face case of obviousness. Without the benefit of hindsight, there is no suggestion or motivation how or why one would select the linear light source and two associated reflectors of Murata and combine them with the arrangement of the two reflectors in the camera assembly of Seymour to obtain the invention as defined by Applicant's claim 17. The arrangement of the two circular reflectors for directing light in two distinct paths to the substrate as shown in the camera assembly of Seymour only makes sense when each reflector has its own associated light source. In other words, no motivation exists to combine these two references, and certainly no motivation exists to combine them in this manner required to obtain the invention defined by claim 17.

Therefore, claim 17 is allowable, as are claims 18-20 which depend from claim 17.

CONCLUSION

In view of the foregoing, entry of the above amendments and allowance of claims 1-5 and 12-23 are respectfully requested. The undersigned is available for telephone consultation at any time.

Respectfully submitted,

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